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September 21, 2000

VIA HAND DELIVERY

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

Re: WT Docket No. 00-48
RM-9499

Dear Ms. Salas:

On behalf of Globe Wireless, Inc. ("Globe Wireless"), we are filing an original and five (5) copies of its Reply Comments in the above-referenced matter.

If there are questions, do not hesitate to call the undersigned at (703) 812-0480.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard R. Raish
Counsel for
Globe Wireless, Inc.

LRR:cej
Enclosures

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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 13 and 80 of the) WT Docket No. 00-48
Commission's Rules concerning)
Maritime Communications)
)
Petition for Rule Making Filed by) RM-9499
Globe Wireless, Inc.)
)
Federal Communications Bar Association's)
Petition for Forbearance from Section 310(d))
of the Communications Act Regarding Non-)
Substantial Assignments of Wireless Licenses)
and Transfers of Control involving)
Telecommunications Carriers)
)
and)
)
Personal Communications Industry Association's)
Broadband Personal Communications Services)
Alliance's Petition for Forbearance for Broadband)
Personal Communications Services)

REPLY COMMENTS OF GLOBE WIRELESS, INC.

Pursuant to Section 1.415 of the Commission's Rules, Globe Wireless, Inc. hereby files these Reply Comments in the above-captioned proceeding.

As stated in its original Comments, Globe Wireless, a major provider of HF maritime communications, is the original petitioner for rulemaking in RM-9499. Globe Wireless generally supports the Commission's proposals to streamline and clarify its Rules, and to remove obsolete and redundant provisions therefrom. While the entirety of Part 80 of the Commission's Rules is important to the maritime services, the principal focus as regards Globe Wireless is the RM-9499 aspect of this proceeding.

The proposals of Globe Wireless reflected in RM-9499 are discussed in paragraphs 25 and 26 of the Notice of Proposed Rulemaking ("Notice"). Specifically, the Commission has proposed to amend its Rules to permit J2B and J2D emission whenever A1A or F1B emission is permitted on high seas frequencies and to permit J2B and J2D emissions whenever J3 emission is permitted on high seas frequencies. In reviewing comments submitted in this proceeding, Globe Wireless has noted no objections to the Commission's proposal as regards the above. The Coast Guard in its comments (at page 4) recommended that all references to use of Morse radiotelegraphy throughout Part 80 be deleted. This recommendation has the effect of supporting the proposals made by the Commission on the aforementioned point. Globe Wireless supports strongly the Commission's proposals set forth in the Notice at paragraph 25 and 26 as well as the aforementioned comments by the Coast Guard.

The "modernizing" of Part 80 requires a prodigious work effort. Globe Wireless applauds the work of the Coast Guard both as to its extensive Comments and to the editing of the complete text of Part 80 that accompanied their Comments. Globe Wireless now urges the Commission to proceed expeditiously to Rulemaking.

Respectfully submitted,

GLOBE WIRELESS INC.

By: Leonard R. Raish

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Date: September 21, 2000